



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 8, 2022

BY EMAIL & ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: **United States v. Juan Orlando Hernandez, a/k/a "JOH," S7 15 Cr. 379 (PKC)**

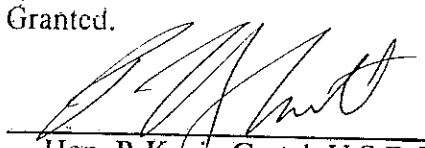
Dear Judge Castel:

The Government respectfully writes, pursuant to the Court's oral order of May 10, 2022, to provide an update on the status of any classified discovery and motion practice in this case. *See* Dkt. 432. In consultation with relevant components of the U.S. Government and the Department of Justice, the Government believes it will be in a position to file a motion pursuant to Section 4 of the Classified Information Procedures Act ("CIPA") by November 14, 2022. (Accordingly, the Government requests a deadline of November 14, 2022.) The Government has also been assisting in the coordination of defense counsel's application for clearance to review classified materials, which is in progress. OK

Should the Court have any questions about the anticipated scope or substance of the Government's Section 4 motion, the Government is available at the Court's convenience for an *ex parte* CIPA Section 2 conference.

Application Granted.

So Ordered:


Hon. P. Kevin Castel, U.S.D.J.

By:

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

/s/

Jacob H. Gutwillig
Michael D. Lockard
Jason A. Richman
Elinor L. Tarlow
Assistant United States Attorneys
(212) 637-1036

cc: Defense Counsel (by ECF)